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Attorneys for Defendant
MARINE TERMINALS CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JAMES TROY WALKER,

Plaintiff,

v.

PACIFIC MARITIME ASSOCIATION;
INTERNATIONAL LONGSHORE
UNION LOCAL 10; MARINE
TERMINALS CORPORATION;
PACIFIC C&H SUGAR,

Defendants.

No. C07-03100 BZ (ADR)

DEFENDANT MARINE TERMINALS
CORPORATION'S NOTICE AND
JOINDER IN C&H SUGAR
COMPANY, INC.'S ARGUMENTS
IN SUPPORT OF MOTION TO
DISMISS PURSUANT TO
F.R.C.P. 12(b)(6) RE: TIME BAR

Date: September 19, 2007

Time: 10:00 AM

Courtroom: G, 15th Floor

Magistrate Judge Bernard Zimmerman

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that defendant Marine Terminals Corporation ("MTC") has already filed a motion to dismiss pursuant to F.R.C.P. 12(b)(6) for the same hearing date, September 19, 2007, at 10:00 AM, as C&H Sugar's motion. After having received the memorandum of points and authorities filed by C&H Sugar, Inc., MTC hereby provides notice that it joins in the authority set out in C&H Sugar's memorandum of points and authorities relating to C&H Sugar's time bar arguments as to plaintiff's claims under Title VII and negligence, in that said time bar arguments and authority are equally applicable to any pleading against MTC.

1 This joinder is without prejudice to MTC's prior position and arguments for
2 dismissal pursuant to F.R.C.P. 12(b)(6).

3 DATED: July 31, 2007

Respectfully submitted,

4 LAW OFFICES OF GARY A. ANGEL

5 /s/ Gary A. Angel

6 Gary A. Angel, Attorneys for Defendant
7 MARINE TERMINALS CORPORATION